

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

Harold Jackson,)	Case No. 2:14-cv-01911-RMG
)	
Plaintiff,)	
)	
v.)	MOTION FOR PROTECTIVE ORDER
)	OR, IN THE ALTERNATIVE,
Trumpf Medical Systems, Inc.,)	<i>IN LIMINE</i>
)	
Defendant.)	
_____)	

Pursuant to Fed. R. Civ. P. 26(c)(1)(A), Plaintiff hereby moves this Honorable Court for an Order preventing the Defendant from taking the deposition of its retained expert witness, David N. DuPuy, M.D., for use at trial or, alternatively, ruling *in limine* that Defendant may not use the deposition (if taken) at trial in lieu of live testimony.

The grounds for this motion are set forth in the Memorandum in Support filed herewith. The undersigned certifies that he has in good faith conferred with opposing counsel in an effort to resolve the disputed matter without court action.

Respectfully submitted,

Jennifer Munter Stark, Esquire
Fed. ID No. 09364
210 Wingo Way #300
Mount Pleasant, SC 29464
Phone: (843) 972-0004
Fax: (843) 792-0006
jmunterstarklaw@gmail.com

and

PETERS, MURDAUGH, PARKER,
ELTZROTH & DETRICK, P.A.

By: /s/ Bert G. Utsey, III
Bert G. Utsey, III

Fed. ID No. 1045
123 Walter Street
Post Office Box 1164
Walterboro, SC 29488
Phone: (843) 549-9544
Fax: (843) 549-9546
butsey@pmped.com

Attorneys for Plaintiff

May 22, 2015
Walterboro, South Carolina